

Luk Oil Gas Station  
(fka/58<sup>th</sup> Street Sunoco)  
5744 Woodland Avenue  
Philadelphia, PA

Facility Identification Number:  
51-32028

Date of Inspection:  
July 14, 2009

|                       |  |
|-----------------------|--|
| Tank Owner:           | Chester Aytch<br>(not present during inspection)<br>215-477-9728 |
| Facility Operator:    | Rathnaker Reddy Patlola<br>609-929-5146                          |
| Inspector:            | Marie Owens<br>215-814-3384                                      |
| EPA Representatives:  | Gary Morton (Inspector)<br>Bowen Hosford (OECEJ)                 |
| DDOE Representatives: | Lawrence Williams<br>Timothy Boyd                                |

Inspector Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## **Background**

On Friday, July 11, 2009 this inspector notified Mr. Patlola and Mr. Aytch (through a representative) of the pending inspection. July 14, 2009, the United State Environmental Protection Agency, Region III (EPA) conducted a compliance inspection of the Gulf gas station located at 5200 Woodland Avenue in Philadelphia, Pennsylvania to determine compliance with the Resource Conservation and Recovery Act (RCRA) Subtitle I. This inspection was part of an ongoing investigation by the EPA. EPA has inspected this facility previously on June 12, 2008 and September 11, 2008. EPA has also conducted information gathering as well as meetings with the facility owner. The Pennsylvania Department of Environmental Protection was notified of the inspection and opted not to attend this inspection. In attendance from EPA Region III were Mr. Gary Morton and Mr. Bowen Hosford. Also in attendance were Mr. Lawrence Williams and Mr. Timothy Boyd both from the District of Columbia Department of the Environment. Mr. Hosford, Mr. Williams and Mr. Boyd attend the inspection to observe inspection procedures and protocol.

## **Inspection Observations**

The facility now advertises as a Luk Oil gas station (See Attachment A Photo 1 -- Facility Overview and Photo 2 -- Facility Overview). During the previous inspection of this facility, the operator was identified as Mr. Reddy Rathnaker. This gentleman's name is corrected in this inspection report as Rathnaker Reddy Patlola. Mr. Patlola assumed operations at this facility in approximately September 2008. There are three (5) federally regulated underground storage tanks (USTs) on site. A facility sketch has been provided in Attachment B of this inspection report.

| Tank #     |   | Size | Material Stored | Material Tank/Piping | Installation Date |
|------------|---|------|-----------------|----------------------|-------------------|
| 1          |   |      | Supreme         | FRP/FRP              | 1987              |
| Manifolded | 2 |      | Regular         | FRP/FRP              | 1987              |
|            | 3 |      | Regular         | FRP/FRP              | 1987              |
| 4          |   |      | Kerosene        | FRP/FRP              | 1987              |
| 5          |   |      | Waste Oil       | UNKNOWN              | 1987              |

Mr. Patlola met the inspection team at the facility. Due to time the constraint of the inspection team, the waste oil was not reviewed during this inspection.

## **SPILL AND OVERFILL**

Tanks 1, 2, 3 and 4 were all equipped with spill buckets (see Photo 1 -- Kerosene spill bucket) on fill pipes and flapper valves as a method of overfill prevention. During previous EPA inspections, it was noted that an alternate fill port on the Kerosene UST did not have spill and/or overfill prevention equipment installed. During this inspection Mr. Patlola showed this inspector that the alternate fill port on the kerosene UST had been permanently capped (see Attachment A Photo 7 -- Kerosene Alternate Fill -- capped).

## CATHODIC PROTECTION

In the submersible turbine pump (STP) manways on the USTs backfill was observed in contact with the pump housing (see Attachment A Photos 3, 5, and 6). EPA previously received copies of cathodic protection testing on the metal piping components by Environmental Testing & Inspection, LLC dated March 17, 2009 which demonstrated that the metal piping components are cathodically protected.

## LINE RELEASE DETECTION

Each of the USTs (T1, T2, T3 and T4) were equipped with mechanical line leak detectors. There were no sump sensors present at the facility. The product lines and line leak detectors on the Regular, Supreme and Kerosene were tested April 2, 2009 by Mid-Atlantic Petroleum Services and passed. All of these tests passed and are included in EPA's historic file.

## TANK RELEASE DETECTION

Mr. Patlola provided this inspector with copies of CSLD results to review for the Regular, Supreme and Kerosene USTs. Passing CSLD results were reviewed for November 2008 through the present. The Veeder Root TLS 350 display read "Delivery Needed". This inspector explained to Mr. Patlola that it is imperative to keep enough fuel in the UST to ensure that the CSLD can adequately function. Mr. Patlola assured this inspector that the USTs would be filled shortly. The inspector printed several reports from the Veeder Root for general information (see ATTCHMENT C). The ATG is currently configured to perform continuous statistical leak detection (CSLD) on all USTs (T1, T2, T3 and T4). The only release detection records available at the facility during the inspection were from November 2008 through the present.

## DISPENSERS

There was one kerosene dispenser and two gasoline dispensers ( $\frac{1}{2}$  and  $\frac{3}{4}$ ) present at the facility. The attendant, Mr. Patlola did not have keys available at the time of the inspection to observe inside the dispensers. Mr. Patlola stated that he would have a contractor remove the covers and provide photographs under each dispenser to this inspector.

## WASTE OIL

Waste oil is stored in an underground storage tank on the property. Due to time constraint, this UST was not reviewed as a part of this inspection.

## ATTACHMENT A PHOTOGRAPH LOG

- Photo 1: Facility Overview
- Photo 2: Facility Overview
- Photo 3: Regular Piping Access Port
- Photo 4: Regular Fill Port
- Photo 5: Premium Piping Access
- Photo 6: Kerosene Piping Sump
- Photo 7: Kerosene Alternate Fill -- Capped

LUK OIL GAS STATION  
FKA/58<sup>TH</sup> STREET SUNOCO  
5744 WOODLAND AVENUE  
51-32028

JULY 14, 2009 INSPECTION



PHOTO 1: FACILITY OVERVIEW

LUK OIL GAS STATION  
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JULY 14, 2009 INSPECTION



PHOTO 2: FACILITY OVERVIEW

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PHOTO 3: REGULAR PIPING PORT

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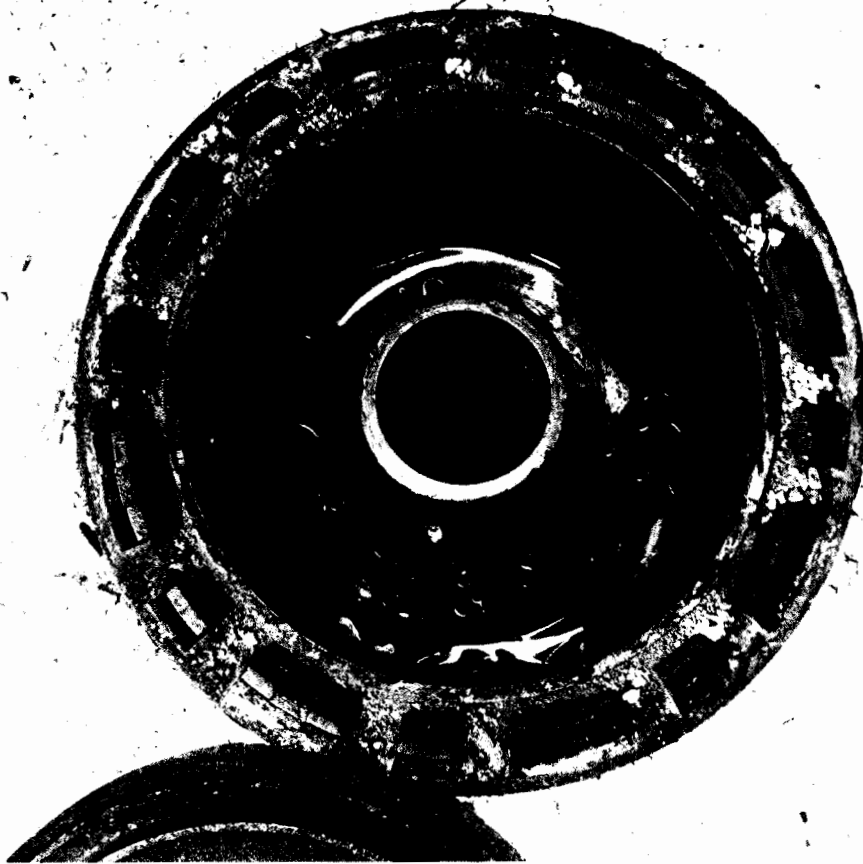


PHOTO 4: REGULAR FILL PORT



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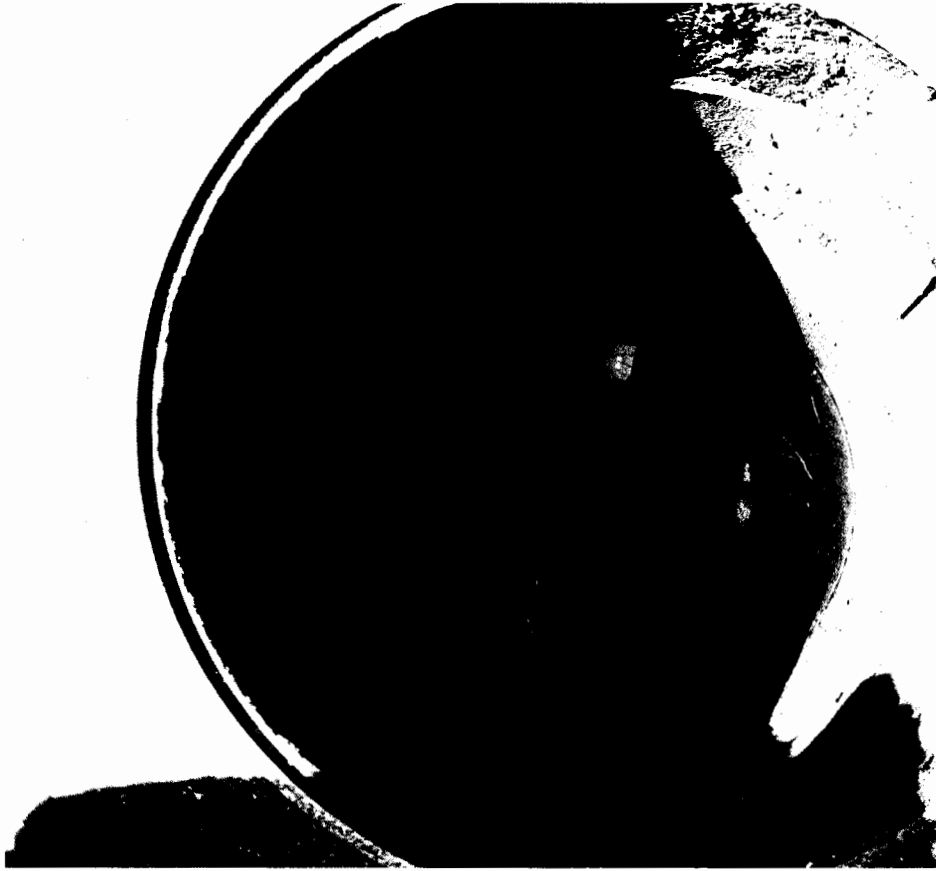


PHOTO 5: PREMIUM PIPING ACCESS

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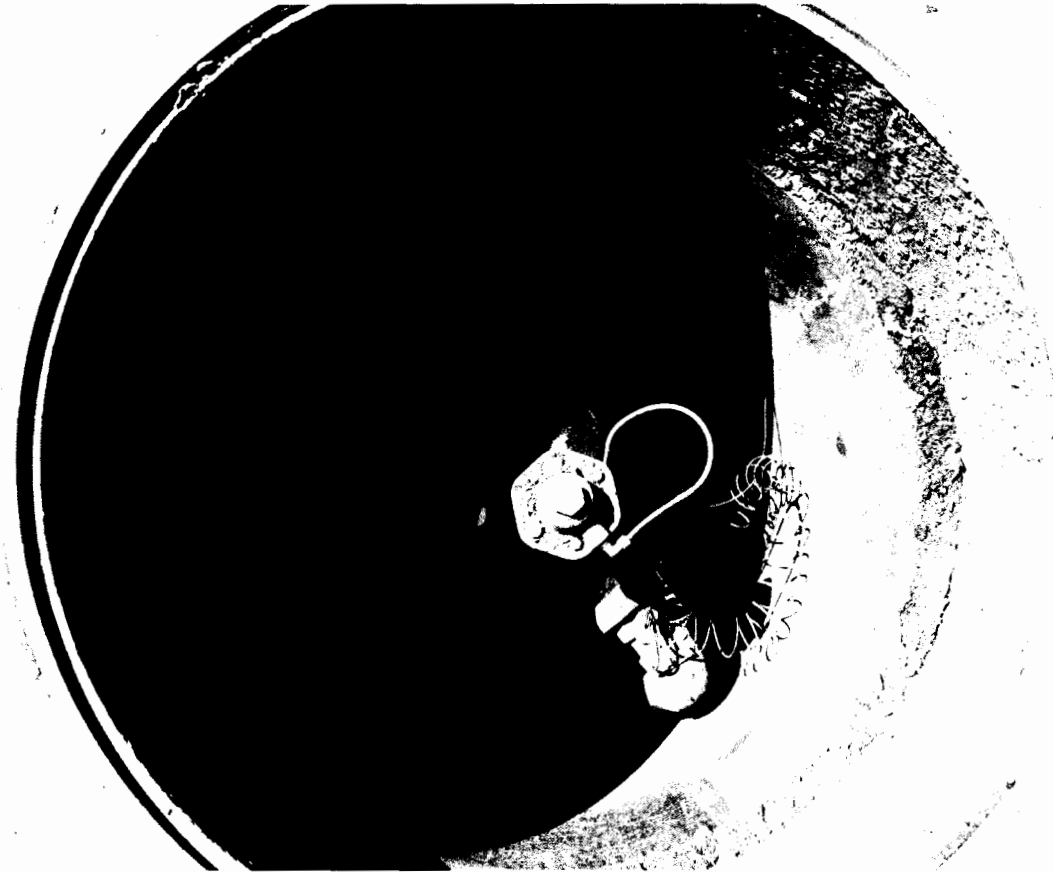


PHOTO 6: KEROSENE PIPING SUMP

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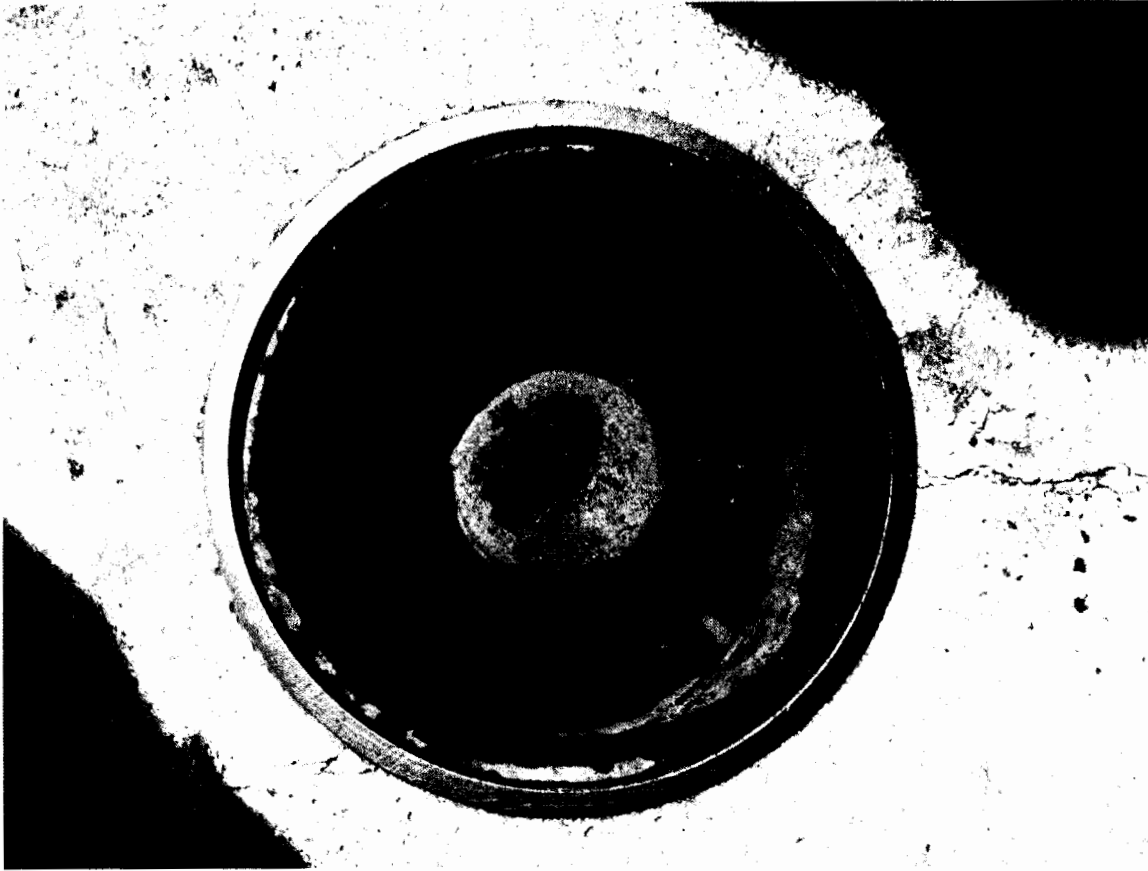
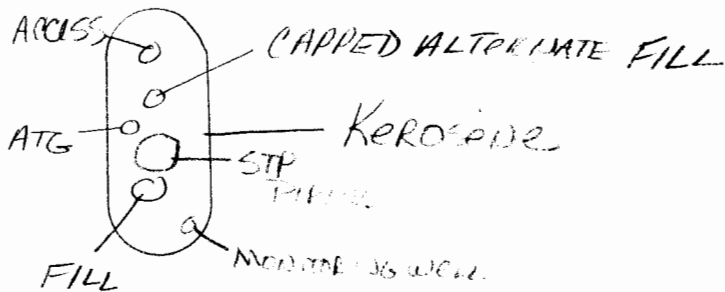
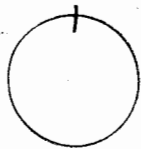


PHOTO 7: KEROSENE ALTERNATE FILL -- CAPPED

GULF  
52<sup>ND</sup> & WOODLAND

## ATTACHMENT B SITE SKETCH

WASTE OIL



← 67<sup>th</sup> St →

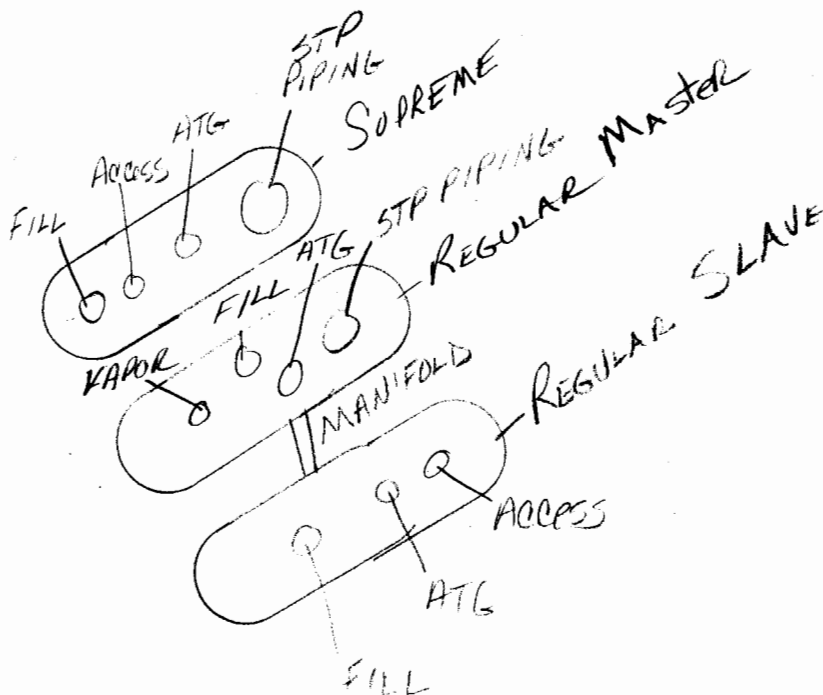
BUILDING

DISP  
1/2

DISP  
3/4

← KEROSENE DISBURSER

HEATING OIL  
VST ACCESS



← WOODLAND AVE →

\* NOT TO SCALE

# ATTACHMENT C ATG REPORTS

# SYSTEM SETUP

JUL 14. 2009 10:48 AM

## SYSTEM UNITS

U.S.  
SYSTEM LANGUAGE  
ENGLISH  
SYSTEM DATE/TIME FORMAT  
MON DD YYYY HH:MM:SS XM

GULF  
58TH AND WOODLAND  
PHILA.,PA

SHIFT TIME 1 : DISABLED  
SHIFT TIME 2 : DISABLED  
SHIFT TIME 3 : DISABLED  
SHIFT TIME 4 : DISABLED

TANK PER TST NEEDED WRN  
DISABLED  
TANK ANN TST NEEDED WRN  
DISABLED

LINE RE-ENABLE METHOD  
PASS LINE TEST

LINE PER TST NEEDED WRN  
DISABLED  
LINE ANN TST NEEDED WRN  
DISABLED

PRINT TO VOLUMES  
ENABLED

TEMP COMPENSATION  
VALUE (DEG F) : 60.0  
STICK HEIGHT OFFSET  
DISABLED  
ULLAGE: 90%  
DAYLIGHT SAVING TIME  
ENABLED  
START DATE  
APR WEEK 1 SUN  
START TIME  
2:00 AM  
END DATE  
OCT WEEK 6 SUN  
END TIME  
2:00 AM

SYSTEM SECURITY  
CODE : 000000

TANK CHART SECURITY  
DISABLED

CUSTOM ALARMS  
DISABLED

MASS/DENSITY  
DISABLED

# COMMUNICATIONS SETUP

## PORT SETTINGS:

NONE FOUND

RS-232 END OF MESSAGE  
DISABLED

## IN-TANK SETUP

T 1:REGULAR 1  
PRODUCT CODE : 1  
THERMAL COEFF : .000700  
TANK DIAMETER : 91.13  
TANK PROFILE : 4 PTS  
FULL VOL : 7950  
68.3 INCH VOL : 6480  
45.6 INCH VOL : 4000  
22.8 INCH VOL : 1512

FLOAT SIZE: 4.0 IN.

WATER WARNING : 2.0  
HIGH WATER LIMIT: 3.0

MAX OR LABEL VOL: 7950  
OVERFILL LIMIT : 90%  
 : 7155  
HIGH PRODUCT : 95%  
 : 7552  
DELIVERY LIMIT : 15%  
 : 1192

LOW PRODUCT : 800  
LEAK ALARM LIMIT: 99  
SUDDEN LOSS LIMIT: 99  
TANK TILT : 0.00  
PROBE OFFSET : 0.00

SIPHON MANIFOLDED TANKS  
T#: 02  
LINE MANIFOLDED TANKS  
T#: NONE

LEAK MIN PERIODIC: 0%  
 : 0

LEAK MIN ANNUAL : 0%  
 : 0

PERIODIC TEST TYPE  
STANDARD

ANNUAL TEST FAIL  
ALARM DISABLED

PERIODIC TEST FAIL  
ALARM DISABLED

GROSS TEST FAIL  
ALARM DISABLED

ANN TEST AVERAGING: OFF  
PER TEST AVERAGING: OFF

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK:OFF

DELIVERY DELAY : 5 MIN  
PUMP THRESHOLD : 10.00%

T 2:REGULAR 2  
PRODUCT CODE : 1  
THERMAL COEFF : .000700  
TANK DIAMETER : 91.13  
TANK PROFILE : 4 PTS  
FULL VOL : 7950  
68.3 INCH VOL : 6480  
45.6 INCH VOL : 4000  
22.8 INCH VOL : 1512

FLOAT SIZE: 4.0 IN.

WATER WARNING : 2.0  
HIGH WATER LIMIT: 3.0

MAX OR LABEL VOL: 7950  
OVERFILL LIMIT : 90%  
7155  
HIGH PRODUCT : 95%  
7552  
DELIVERY LIMIT : 15%  
1192

LOW PRODUCT : 800  
LEAK ALARM LIMIT: 99  
SUDDEN LOSS LIMIT: 99  
TANK TILT : 0.00  
PROBE OFFSET : 0.00

SIPHON MANIFOLDED TANKS  
T#: 01  
LINE MANIFOLDED TANKS  
T#: NONE

LEAK MIN PERIODIC: 25%  
: 1987

LEAK MIN ANNUAL : 25%  
: 1987

PERIODIC TEST TYPE  
STANDARD

ANNUAL TEST FAIL  
ALARM DISABLED

PERIODIC TEST FAIL  
ALARM DISABLED

GROSS TEST FAIL  
ALARM DISABLED

ANN TEST AVERAGING: OFF  
PER TEST AVERAGING: OFF

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK:OFF

DELIVERY DELAY : 5 MIN  
PUMP THRESHOLD : 10.00%

T 3:SUPER  
PRODUCT CODE : 2  
THERMAL COEFF : .000700  
TANK DIAMETER : 91.13  
TANK PROFILE : 4 PTS  
FULL VOL : 7950  
68.3 INCH VOL : 6480  
45.6 INCH VOL : 4000  
22.8 INCH VOL : 1512

FLOAT SIZE: 4.0 IN.

WATER WARNING : 2.0  
HIGH WATER LIMIT: 3.0

MAX OR LABEL VOL: 7950  
OVERFILL LIMIT : 90%  
7155  
HIGH PRODUCT : 95%  
7552  
DELIVERY LIMIT : 15%  
1192

LOW PRODUCT : 800  
LEAK ALARM LIMIT: 99  
SUDDEN LOSS LIMIT: 99  
TANK TILT : 0.00  
PROBE OFFSET : 0.00

SIPHON MANIFOLDED TANKS  
T#: NONE  
LINE MANIFOLDED TANKS  
T#: NONE

LEAK MIN PERIODIC: 25%  
: 1987

LEAK MIN ANNUAL : 25%  
: 1987

PERIODIC TEST TYPE  
STANDARD

ANNUAL TEST FAIL  
ALARM DISABLED

PERIODIC TEST FAIL  
ALARM DISABLED

GROSS TEST FAIL  
ALARM DISABLED

ANN TEST AVERAGING: OFF  
PER TEST AVERAGING: OFF

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK:OFF

DELIVERY DELAY : 5 MIN  
PUMP THRESHOLD : 10.00%

T 4:KEROSENE  
PRODUCT CODE : 3  
THERMAL COEFF : .000450  
TANK DIAMETER : 91.13  
TANK PROFILE : 4 PTS  
FULL VOL : 9816  
68.3 INCH VOL : 7985  
45.6 INCH VOL : 4000  
22.8 INCH VOL : 1883

FLOAT SIZE: 4.0 IN.

WATER WARNING : 2.0  
HIGH WATER LIMIT: 3.0

MAX OR LABEL VOL: 9816  
OVERFILL LIMIT : 90%  
8834  
HIGH PRODUCT : 95%  
9325  
DELIVERY LIMIT : 1%  
98

LOW PRODUCT : 1  
LEAK ALARM LIMIT: 25  
SUDDEN LOSS LIMIT: 25  
TANK TILT : 0.00  
PROBE OFFSET : 0.00

SIPHON MANIFOLDED TANKS  
T#: NONE  
LINE MANIFOLDED TANKS  
T#: NONE

LEAK MIN PERIODIC: 25%  
: 2454

LEAK MIN ANNUAL : 25%  
: 2454

PERIODIC TEST TYPE  
STANDARD

ANNUAL TEST FAIL  
ALARM DISABLED

PERIODIC TEST FAIL  
ALARM DISABLED

GROSS TEST FAIL  
ALARM DISABLED

ANN TEST AVERAGING: OFF  
PER TEST AVERAGING: OFF

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK:OFF

DELIVERY DELAY : 5 MIN  
PUMP THRESHOLD : 10.00%



LEAK TEST METHOD

TEST CSLD : ALL TANK  
Pd = 95%  
CLIMATE FACTOR:MODERATE

REPORT ONLY:  
DISABLED

TST EARLY STOP:DISABLED

LEAK TEST REPORT FORMAT  
NORMAL

LIQUID SENSOR SETUP

NONE

GULF  
58TH AND WOODLAND  
PHILA..PA

JUL 14, 2009 10:49 AM

LEAK TEST REPORT

T 1:REGULAR 1  
PROBE SERIAL NUM 081301

TEST STARTING TIME:  
OCT 30, 2008 10:39 AM

TEST LENGTH = 3.0 HRS  
STRT VOLUME = 5739.5 GAL

START TEMP = 61.3 F  
END TEMP = 61.6 F

TEST PERIODS 2-6  
0.02 0.03 0.08 0.10  
-5.30

LEAK TEST RESULTS  
RATE = -2.12 GAL/HR  
0.20 GAL/HR TEST INVL

0.20 GAL/HR FLAGS:  
TEMP CHANGE TOO LARGE

\*\*\*\*\* END \*\*\*\*\*

GULF  
58TH AND WOODLAND  
PHILA..PA

JUL 14, 2009 10:49 AM

LEAK TEST REPORT

T 2:REGULAR 2  
PROBE SERIAL NUM 754518

TEST STARTING TIME:  
OCT 30, 2008 10:39 AM

TEST LENGTH = 3.0 HRS  
STRT VOLUME = 5828.3 GAL

START TEMP = 60.4 F  
END TEMP = 60.8 F

TEST PERIODS 2-6  
0.12 0.24 -0.37 -0.51  
-0.46

LEAK TEST RESULTS  
RATE = -0.18 GAL/HR  
0.20 GAL/HR TEST INVL

0.20 GAL/HR FLAGS:  
TEMP CHANGE TOO LARGE

\*\*\*\*\* END \*\*\*\*\*

GULF  
58TH AND WOODLAND  
PHILA..PA

JUL 14, 2009 10:49 AM

LEAK TEST REPORT

T 3:SUPER  
PROBE SERIAL NUM 762115

TEST STARTING TIME:  
OCT 30, 2008 10:39 AM

TEST LENGTH = 3.0 HRS  
STRT VOLUME = 809.4 GAL

START TEMP = 69.7 F  
END TEMP = 69.7 F

TEST PERIODS 2-6  
0.00 0.00 0.01 0.01  
-2.01

LEAK TEST RESULTS  
RATE = -0.81 GAL/HR  
0.20 GAL/HR TEST INVL

0.20 GAL/HR FLAGS:  
LOW LEVEL TEST ERROR  
PERCENT VOLUME TOO LOW

\*\*\*\*\* END \*\*\*\*\*

GULF  
58TH AND WOODLAND  
PHILA..PA

JUL 14, 2009 10:50 AM

LEAK TEST REPORT

T 4:KEROSENE  
PROBE SERIAL NUM 081296

TEST STARTING TIME:  
OCT 30, 2008 10:39 AM

TEST LENGTH = 3.0 HRS  
STRT VOLUME = 2696.8 GAL

START TEMP = 71.1 F  
END TEMP = 71.0 F

TEST PERIODS 2-6  
0.07 0.03 0.03 0.00  
-0.02

LEAK TEST RESULTS  
RATE = -0.00 GAL/HR  
0.20 GAL/HR TEST PASS

\*\*\*\*\* END \*\*\*\*\*

GULF  
58TH AND WOODLAND  
PHILA..PA

JUL 14. 2009 10:48 AM

SYSTEM STATUS REPORT

T 3:DELIVERY NEEDED

INVENTORY REPORT

T 1:REGULAR 1

VOLUME = 5088 GALS  
ULLAGE = 2862 GALS  
90% ULLAGE= 2067 GALS  
TC VOLUME = 5030 GALS  
HEIGHT = 55.10 INCHES  
WATER VOL = 29 GALS  
WATER = 1.69 INCHES  
TEMP = 76.3 DEG F

T 2:REGULAR 2

VOLUME = 3113 GALS  
ULLAGE = 4837 GALS  
90% ULLAGE= 4042 GALS  
TC VOLUME = 3090 GALS  
HEIGHT = 37.84 INCHES  
WATER VOL = 10 GALS  
WATER = 0.92 INCHES  
TEMP = 70.3 DEG F

T 3:SUPER

VOLUME = 1089 GALS  
ULLAGE = 6861 GALS  
90% ULLAGE= 6066 GALS  
TC VOLUME = 1081 GALS  
HEIGHT = 18.19 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 69.6 DEG F

T 4:KEROSENE

VOLUME = 2329 GALS  
ULLAGE = 7487 GALS  
90% ULLAGE= 6505 GALS  
TC VOLUME = 2321 GALS  
HEIGHT = 26.69 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 66.9 DEG F

MANIFOLDED TANKS  
INVENTORY TOTALS

T 1:REGULAR 1

T 2:REGULAR 2

VOLUME = 8201 GALS  
TC VOLUME = 8120 GALS

\*\*\*\*\* END \*\*\*\*\*